

23cr368 MJD/ECW

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	INDICTMENT
)	
Plaintiff,)	18 U.S.C. § 2
)	21 U.S.C. § 841(a)(1)
v.)	21 U.S.C. § 841(b)(1)(A)
)	21 U.S.C. § 841(b)(1)(B)
1. CRISTINA ANN BROOKS,)	21 U.S.C. § 846
)	21 U.S.C. § 853
2. DARREN CHRISTOPHER BROWN,)	
)	
3. COREY MICHAEL KOKETTE,)	
)	
4. SHAD LAWRENCE LEMON,)	
)	
5. TONY MICHAEL MELINE, and)	
)	
6. DERRICK JOHN MOSTAD,)	
)	
Defendants.)	

THE UNITED STATES GRAND JURY CHARGES THAT:

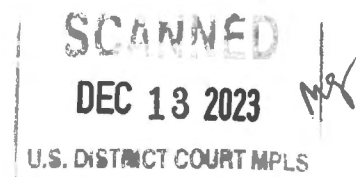
COUNT 1

(Conspiracy to Distribute Methamphetamine)

Beginning in or about the fall of 2022 and continuing through on or about November 7, 2023, in the State and District of Minnesota, and elsewhere, the defendants,

**CRISTINA ANN BROOKS,
DARREN CHRISTOPHER BROWN,
COREY MICHAEL KOKETTE,
SHAD LAWRENCE LEMON,
TONY MICHAEL MELINE, and
DERRICK JOHN MOSTAD,**

did unlawfully, knowingly and intentionally conspire with each other and with others, known and unknown to the grand jury, to distribute 50 grams or more of actual



United States v. Cristina Ann Brooks, et al.

methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846.

COUNT 2

(Distribution of Methamphetamine)

On or about January 30, 2023, the defendant,

DERRICK JOHN MOSTAD,

did unlawfully, knowingly and intentionally distribute 5 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 3

(Possession With the Intent to Distribute Methamphetamine)

On or about February 13, 2023, the defendant,

DERRICK JOHN MOSTAD,

did unlawfully, knowingly and intentionally possess with the intent to distribute 50 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 4

(Distribution of Methamphetamine)

On or about February 21, 2023, the defendants,

**DARREN CHRISTOPHER BROWN, and
TONY MICHAEL MELINE,**

each aiding and abetting the other, did unlawfully, knowingly distribute 5 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United

United States v. Cristina Ann Brooks, et al.

States Code, Sections 841(a)(1) and 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT 5

(Distribution of Methamphetamine)

On or about April 6, 2023, the defendant,

COREY MICHAEL KOKETTE,

did unlawfully, knowingly and intentionally distribute 50 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 6

(Possession With the Intent to Distribute Methamphetamine)

On or about April 13, 2023, the defendant,

TONY MICHAEL MELINE,

did unlawfully, knowingly and intentionally possess with the intent to distribute 50 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 7

(Distribution of Methamphetamine)

On or about May 11, 2023, the defendants,

**DARREN CHRISTOPHER BROWN, and
COREY MICHAEL KOKETTE,**

each aiding and abetting the other, did unlawfully, knowingly and intentionally distribute 50 grams or more of actual methamphetamine, a controlled substance, all in violation of

United States v. Cristina Ann Brooks, et al.

Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 8

(Possession With the Intent to Distribute Methamphetamine)

On or about May 22, 2023, the defendant,

COREY MICHAEL KOKETTE,

did unlawfully, knowingly and intentionally possess with the intent to distribute 50 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 9

(Possession With the Intent to Distribute Methamphetamine)

On or about May 22, 2023, the defendant,

DARREN CHRISTOPHER BROWN,

did unlawfully, knowingly and intentionally possess with the intent to distribute 5 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 10

(Distribution of Methamphetamine)

On or about June 7, 2023, the defendant,

CRISTINA ANN BROOKS,

did unlawfully, knowingly and intentionally distribute 50 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

United States v. Cristina Ann Brooks, et al.

COUNT 11

(Possession With the Intent to Distribute of Methamphetamine)

On or about September 6, 2023, the defendant,

CRISTINA ANN BROOKS,

did unlawfully, knowingly and intentionally possess with the intent to distribute 50 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 12

(Possession With the Intent to Distribute of Methamphetamine)

On or about September 11, 2023, the defendant,

SHAD LAWRENCE LEMON,

did unlawfully, knowingly and intentionally possess with the intent to distribute 5 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 13

(Possession With the Intent to Distribute of Methamphetamine)

On or about November 7, 2023, the defendant,

SHAD LAWRENCE LEMON,

did unlawfully, knowingly and intentionally possess with the intent to distribute 50 grams or more of actual methamphetamine, a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

United States v. Cristina Ann Brooks, et al.

FORFEITURE ALLEGATION

If convicted of any of Counts 1 through 13 of this Indictment, the defendants,

**CRISTINA ANN BROOKS,
DARREN CHRISTOPHER BROWN,
COREY MICHAEL KOKETTE,
SHAD LAWRENCE LEMON,
TONY MICHAEL MELINE, and
DERRICK JOHN MOSTAD,**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of each such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of each such violation. If any of the above-described property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property under Title 21, United States Code, Section 853(p).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON